

**ExxonMobil Pipeline Company**  
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**Jason Pociask**  
Terminal Superintendent



March 11, 2015

Water Technical Unit (SMR-04)  
U.S. Environmental Protection Agency  
5 Post Office Square – Suite 100  
Boston, Massachusetts 02109-3912

RE: Submission of Discharge Monitoring Reports  
Permit No. MA0000833

Dear Sir/Madam:

This report is being submitted on behalf of ExxonMobil Oil Corporation. The February 2015 Discharge Monitoring Reports have been submitted via the NetDMR system to the US EPA, including the permit-required analytical reports for these periods:

- February 1-28, 2015 Monthly DMR Period
  - No sampling from outfall 01A
  - No discharge from outfall 01B
  - Sampled from outfall 01C on February 17, 2015

As noted in the comment section of the February DMR for Outfall 01A, monthly sampling did not take place at this location in February, 2015 due to extraordinary weather conditions as further detailed below.

Please note the following excerpt from ExxonMobil's NPDES permit:  
*Part I.A.2. Footnote 2. Sampling frequency of 1/month is defined as the sampling of one (1) significant rain event in each calendar month*

ExxonMobil closely monitored daily weather conditions including precipitation and temperatures in February. Prolonged frozen conditions (average daily temperature of 19°F) and record-breaking amounts of snow (over 100 inches) occurred in the greater Boston area in January and February. Although a minimal\* amount of flow was recorded due to automated pump level controls in the oil/water separator system permitted under Outfall 01A, there was no occurrence of a discharge from a "significant rain event" that could be sampled in the entire month of February.

*\* Small volume discharges on 5 individual days totaled 23,134 gallons versus a typical monthly average of > 4,000,000 gallons*

As the ExxonMobil individual NPDES permit does not provide instructions specific to this situation, the guidance in EPA's Industrial Stormwater Monitoring and Sampling Guide, March 2009, was considered in the event of a discharge occurring from snowmelt.

Section 2.5 of the document addresses circumstances under which a permittee under the Multi-Sector General Permit (MSGP) is unable to sample, as cited below:

***What To Do If You Are Unable To Sample*** – EPA acknowledges there may be times you are unable to complete required monitoring. The following are guidelines on how you should deal with such times.

*Snowmelt Sampling* – If you are located where appreciable snow is common, one of your samples must include the capture of snowmelt discharge. If, however, you experience prolonged subfreezing temperatures, you may only be able to acquire a sample once over two quarters. You will then have to complete the monitoring requirements as above.

Based on this guidance, ExxonMobil is prepared to collect samples from two separate discharges from Outfall 01A resulting from a "significant rain event", and/or snowmelt should they occur in the months of March or April.

If you have any questions, please contact me at (617) 381-2802.

Sincerely,

A handwritten signature in black ink, appearing to read 'JED' with a stylized flourish extending from the end.

Jason Pociask  
Terminal Superintendent

cc: Mass. Dept. of Environmental Protection, Division of Watershed Management –Surface Water  
Discharge Permit Program  
Mass. Dept. of Environmental Protection, Northeast Regional Office-Bureau of Waste Prevention